

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE LUIS ROSARIO PEREZ

DEBTOR

CASE NO. 18-06720/MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME
TO REPLY TO *MOTION TO DISMISS*, DOCKET NO. 59**

TO THE HONORABLE COURT:

NOW COMES, JOSE LUIS ROSARIO PEREZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 17, 2023, Puerto Rico's Administration for Child Support (ASUME), filed a *Motion to Dismiss*, Docket No. 59, alleging that the Debtor has defaulted in the post-petition payments to ASUME in the amount of \$3,120.00.

2. The Debtor met with the undersigned attorney regarding this matter and respectfully admits that he did incur in certain post-petition arrears with ASUME. However, on March 8, 2023 a payment in the sum of \$5,176.00 was applied to the Debtor's DSO account held by Child Support Enforcement in the State of North Carolina. Attached is copy of a receipt for said payment.

3. The Debtor is in the process of investigating this matter to determine the actual DSO amount owed and obtain the funds to cure the aforestated arrears.

4. The Debtor respectfully requests additional time of thirty (30) days within to cure the arrears and file a reply to the *Motion to Dismiss*, Docket No. 59. This extension of time to expire on April 15, 2023.

WHEREFORE, based on the above stated, the Debtor respectfully prays that the Honorable Court grant the present motion and grant the requested extension of time, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee, Jose R. Carrion, Esq.; Grace M. Figueroa Irizarry Esq., Counsel for Puerto Rico's Administration for Child Support (ASUME); I also certify that a copy of this motion was sent via US Mail to the Debtor Jose Luis Rosario Perez, RR36 Box 7524, San Juan PR 00926.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 16th day of March, 2023.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY for the DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787- 744-7699/787-963-7699
Email: rfc@rfigueroalaw.com

We applied your payment to debt that you owe to the following agency:

CHILD SUPPORT ENFORCEMENT
NC MECKLENBURG CO CSE AGENCY
5800 EXECUTIVE CENTER DR. SUITE 200
CHARLOTTE, NC 28212

TOP Trace Number: 193610261
Account #: 000000000012877863
Applied To This Debt: \$5176.00
Type of Debt: Child Support

(704) 432-9300

Please see additional pages for other debts, if any.